

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C. 20554

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations
(Frankenmuth, Michigan)

) MM Docket No.
) RM No.
)
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

To: Chief, Mass Media Bureau

PETITION FOR RULEMAKING

Frankenmuth Broadcasting, Inc. ("FBI"), by counsel and pursuant to Section 1.401 of the Commission's rules, hereby requests the Commission to amend the FM Table of Allotments (Section 73.202(b) of the rules) as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Frankenmuth, Michigan	- - -	229A

In support of this request, the following is stated:

FBI proposes the allotment of Channel 229A to Frankenmuth, Michigan. Frankenmuth is an incorporated community with a population of 4,408.¹ The city is governed by a mayor and six council members. It has its own police department, volunteer fire department, school district, and water treatment plant. Frankenmuth's businesses include eight hotels/motels.

¹ U.S. Census (1990).

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As demonstrated in the attached engineering statement, the special reference points for the Channel 229A allotment are located approximately 14.9 kilometers east-southeast of Frankenmuth. The proposed site will provide an unobstructed view of the city of Frankenmuth, and is located close enough to serve the entire community with the required 3.16 mV/m contour.

In addition, the proposed site meets the minimum separation requirements with respect to all known licenses, construction permits, open allotments, pending applications, and pending rulemakings, with the sole exception of Station CKLW-FM, operating on FM Channel 230C1 at Windsor, Ontario. Under the U.S.-Canadian Agreement, a specially negotiated short-spaced allotment is permitted, provided no objectionable interference is caused to the other country. In this case, although some overlap will be caused to Station CKLW operating with maximum facilities, all of the overlap is over U.S. land, and is confined to the State of Michigan. Thus, it is not objectionable under the Agreement. Moreover, Station CKLW is operating with an ERP of only 100 kW directionally, with an antenna HAAT of 200 meters. Therefore, the actual overlap caused and received will be substantially less than if CKLW were operating with maximum facilities.

FBI commits to file for the new facility upon grant of the allotment, and to construct the new facility promptly upon the grant of its application for a construction permit.

WHEREFORE, In light of the foregoing, Frankenmuth Broadcasting, Inc., requests the Commission to GRANT this petition for rulemaking, AMEND the FM Table of Allotments, and ALLOT Channel 229A to Frankenmuth, Michigan.

Respectfully submitted,

FRANKENMUTH BROADCASTING, INC.

By 
Harry C. Martin
Andrew S. Kersting

Its Counsel

Reddy, Begley, Martin & McCormick
1001 22nd Street, N.W.
Suite 350
Washington, D.C. 20037

April 12, 1995

PETITION FOR RULEMAKING

**To Add Channel 229A To
FM Table of Allotments at
Frankenmuth, MI**

April 1995

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E. HAROLD MUNN, JR. & ASSOCIATES, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

ENGINEERING STATEMENT

In Support of a Petition To Amend §73.202(b)

The firm of E. Harold Munn, Jr. & Associates, Inc., was retained to prepare this Engineering Statement in support of a petition to amend 47 C.F.R. Section 73.202(b), the FM Table of Allotments.

It is proposed to amend the Table to add Channel 229(A), 93.7 MHz for use at Frankenmuth, Michigan. The proposed special reference site meets the spacings of 47 C.F.R. §73.207(b)(1)(2) with respect to all domestic allotments. A request for a specially negotiated short-spacing is included with this petition with respect to Canadian station CLKW, Windsor, Ontario. An open area exists where a transmitter site may be located.

Data contained in this report is responsive to the requirements of the Rules, as amended.

Figure 1 is a pertinent portion of the computer study which demonstrates that, at the reference point listed, and for the class of station proposed, all the required domestic separations are fully met for the allotment of Channel 229(A).

However, Figure 1 shows that the proposed allotment is short spaced under the U.S.-Canadian Agreement towards CKLW by 46.68 kilometers. The Agreement specifies that the spacing requirement for adjacent channel Class C1 versus Class B1 (U.S. 6 kW Class A allotments are referred to Canada as Class B1) is 181 kilometers. A study was made of the contour overlap that would occur with the proposed allotment. Figure 2 of this petition demonstrates that the CKLW 54 dBu (50/50) protected contour will be overlapped by the proposed allotment's 48 dBu (50/10) contour only in U.S. territory. CKLW was considered as a full Class C1 facility. As a matter of fact, the proposed allotment's 48 dBu contour is wholly contained in the State of Michigan. CKLW is not protected outside of Canadian territory. Therefore, it is requested that this proposal be referred to the Canadian government for a waiver of this requirement of the U.S.-Canadian Agreement.

Additionally, the same contour relationship would be required for protection to the proposed allotment under the U.S.-Canadian Agreement. However, domestic rules specify that the protected contour for a Class A station is the 60 dBu contour. Figure 2 demonstrates that, employing the same 6 dB protection ratio, the proposed allotment's 60 dBu (50/50) contour is not overlapped by the CKLW 54 dBu (50/10) contour. Figure 3 is a tabulation of the calculation of the contours depicted in Figure 2.

E. HAROLD MUNN, JR. & ASSOCIATES, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

ENGINEERING STATEMENT

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In Support of a Petition To Amend §73.202(b)

A special reference point was employed for this rulemaking at NL 43°18'21"; WL 83°33'28". This reference point is 14.9 kilometers east-southeast of the community reference coordinates. This reference point was chosen because it is as close to CKLW as the open area will allow. This is a point proximate to the city from which the 3.16 mV/m (70 dBu) contour of the proposed facility would encompass the entire community. Figure 4 is a map showing the transmitter "open area" with respect to the proposed city of allotment. Figure 5 is a map showing the 70 dBu (3.16 mV/m) city grade contour and the 60 dBu (1.0 mV/m) protected contour from the special reference point location. This exhibit shows that the 70 dBu contour covers the entire city limits of Frankenmuth, as required by 47 C.F.R. §73.315(a) and (b). Figure 6 is a tabulation of the contours shown in Figure 5.

It is requested that 47 C.F.R. §73.202(b) be amended as follows.


<u>CITY, STATE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Frankenmuth, MI	---	<u>229A</u>

CERTIFICATION

This Engineering Statement was prepared by the undersigned, a member of the staff of E. Harold Munn, Jr. & Associates, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan 49036-0220.

I hereby certify the contents of this Engineering Statement to be true and accurate to the best of my knowledge and belief. My qualifications are a matter of record before the Federal Communications Commission.

Dated this 7th day of April, 1995 by


Wayne S. Reese
President

E. Harold Munn, Jr. & Associates, Inc.
P. O. Box 220 100 Airport Road
Coldwater, Michigan 49036

Phone: (517) 278-7339
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E. HAROLD MUNN, JR. & ASSOCIATES, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

FIGURE 1

TABULATION OF SPACINGS FROM PROPOSED ALLOTMENT

E. Harold Munn Jr. & Associates Inc.
P.O. Box 220 - Coldwater MI 49036

**TABULATION OF SPACINGS FROM SPECIAL REFERENCE POINT
FRANKENMUTH MICHIGAN**

REFERENCE		CLASS = A	DISPLAY DATES
43 18 21 N			DATA 02-24-95
83 33 28 W		Current Spacings	SEARCH 04-06-95
----- Channel 229 - 93.7 MHz -----			

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
CKLWFM OP	230C1	Windsor	ON	134.32	159.7	181.0	-46.68
42 10 15	82 59 29	ADCN	100.000 kW		200 M		
					921004		
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION							
WBCT LI	229B	Grand Rapids	MI	178.03	245.7	178.0	0.03
42 37 56	85 32 16	C CN	320.000 kW		238 M		
		Radio Associates of Michigan,		BLH800616AK	921004		
		GRANDFATHERED AT 320KW @ 238M HAAT.					
CBCLFM OP	228C1	London	ON	183.33	101.5	181.0	2.33
42 57 20	81 21 20	A CN	100.000 kW		216 M		
					921004		
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION.							
WHMIFM AP	228A	Howell	MI	77.92	203.6	72.0	5.92
42 39 47	83 56 24	C CN	5.200 kW		108 M		
		The Livingston Radio Company		BPH920325IE	921029		
WHMIFM LI	228A	Howell	MI	77.92	203.6	72.0	5.92
42 39 47	83 56 24	C CN	3.000 kW		91 M		
		The Livingston Radio Company		BMLH910111KB	921016		
WHMIFM AP	228A	Howell	MI	77.92	203.6	72.0	5.92
42 39 47	83 56 24	C CN	6.000 kW		96 M		
		The Livingston Radio Company		BPH891220IA	921016		
WKQZ LI	227C2	Midland	MI	73.94	324.6	55.0	18.94
43 50 46	84 05 32	C CN	39.000 kW		169 M		
		Windward Communications II, I		BLH881027KB	921004		
		From Channel 228A					
WUVE LI	283A	Saginaw	MI	31.24	288.2	10.0	21.24
43 23 34	83 55 27	CZCN	2.900 kW		126 M		
		Thomas M. Eells		BLH920825KB	930225		
		Proposed to Canada as B1 on 910912-Accepted by Canada 911107					
WLTI LI	226B	Detroit	MI	97.20	162.5	69.0	28.20
42 28 16	83 12 03	CDCN	26.500 kW		204 M		
		Viacom International, Inc.		BLH860613KB	921004		
AL229 AL	229B	Owen Sound	ON	252.99	55.4	223.0	29.99
44 34 00	80 56 00	A	0.000 kW		0 M		
					921004		

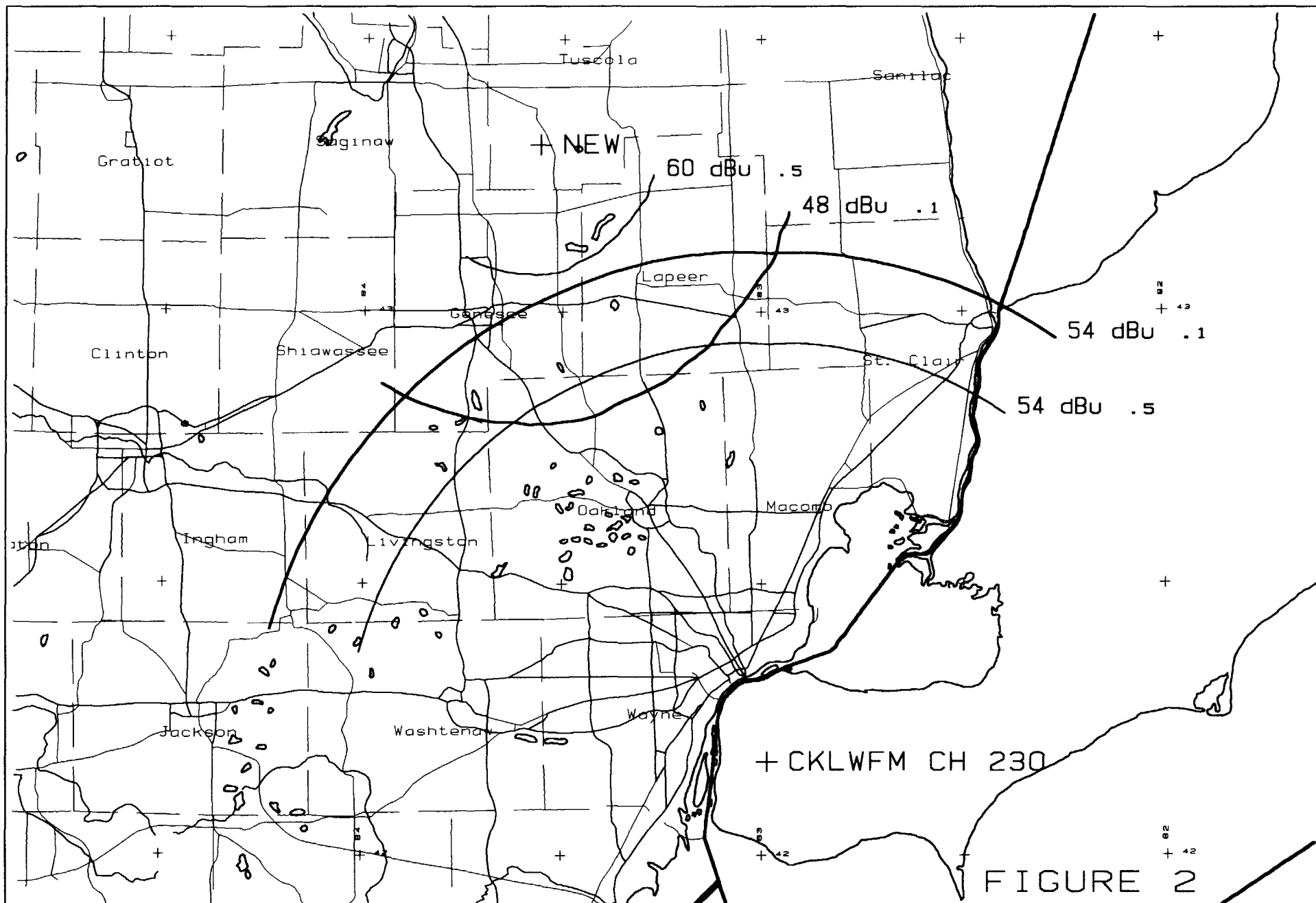


FIGURE 2

Scale in km
0 10 20 30 40 50 60 70

NEW - FRANKENMUTH, MI 229A 6kW @ 100M
CKLWFM-WINDSOR, ONT 230C1 100kW @ 299M

FRANKENMUTH VS CKLW
MUNN & ASSOC. - 04/95

Predicted Signal Contours:

43 18 21 - FIGURE 3

83 33 28 - TABULATION OF PROPOSED FRANKENMUTH, MI CONTOURS

ERP = 6 kW, 7.782 dBk FM - 2-6 Tables						
Radial	HAAT	kW	dBk	Field	60 dBu.5	48 dBu.1
100 Degr.	68.6M	6.000	7.782	1.000	23.8	52.7
101 Degr.	68.6M	6.000	7.782	1.000	23.8	52.7
102 Degr.	68.4M	6.000	7.782	1.000	23.7	52.6
103 Degr.	68.2M	6.000	7.782	1.000	23.7	52.6
104 Degr.	68.2M	6.000	7.782	1.000	23.7	52.6
105 Degr.	68.6M	6.000	7.782	1.000	23.8	52.7
106 Degr.	68.8M	6.000	7.782	1.000	23.8	52.7
107 Degr.	68.6M	6.000	7.782	1.000	23.8	52.7
108 Degr.	68.1M	6.000	7.782	1.000	23.7	52.5
109 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
110 Degr.	67.2M	6.000	7.782	1.000	23.6	52.3
111 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
112 Degr.	68.2M	6.000	7.782	1.000	23.7	52.6
113 Degr.	69.0M	6.000	7.782	1.000	23.8	52.8
114 Degr.	69.7M	6.000	7.782	1.000	23.9	53.0
115 Degr.	70.1M	6.000	7.782	1.000	24.0	53.1
116 Degr.	70.2M	6.000	7.782	1.000	24.0	53.1
117 Degr.	70.0M	6.000	7.782	1.000	24.0	53.0
118 Degr.	69.5M	6.000	7.782	1.000	23.9	52.9
119 Degr.	68.8M	6.000	7.782	1.000	23.8	52.7
120 Degr.	68.1M	6.000	7.782	1.000	23.7	52.5
121 Degr.	67.7M	6.000	7.782	1.000	23.6	52.4
122 Degr.	67.6M	6.000	7.782	1.000	23.6	52.4
123 Degr.	67.6M	6.000	7.782	1.000	23.6	52.4
124 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
125 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
126 Degr.	67.4M	6.000	7.782	1.000	23.6	52.3
127 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
128 Degr.	67.7M	6.000	7.782	1.000	23.6	52.4
129 Degr.	67.7M	6.000	7.782	1.000	23.6	52.4
130 Degr.	67.7M	6.000	7.782	1.000	23.6	52.4
131 Degr.	67.7M	6.000	7.782	1.000	23.6	52.4
132 Degr.	67.7M	6.000	7.782	1.000	23.6	52.4
133 Degr.	67.6M	6.000	7.782	1.000	23.6	52.4
134 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
135 Degr.	67.5M	6.000	7.782	1.000	23.6	52.4
136 Degr.	68.0M	6.000	7.782	1.000	23.7	52.5
137 Degr.	68.8M	6.000	7.782	1.000	23.8	52.7
138 Degr.	69.8M	6.000	7.782	1.000	24.0	53.0
139 Degr.	70.7M	6.000	7.782	1.000	24.1	53.2
140 Degr.	71.1M	6.000	7.782	1.000	24.1	53.3
141 Degr.	71.2M	6.000	7.782	1.000	24.2	53.4
142 Degr.	71.2M	6.000	7.782	1.000	24.2	53.4
143 Degr.	71.3M	6.000	7.782	1.000	24.2	53.4
144 Degr.	71.4M	6.000	7.782	1.000	24.2	53.4
145 Degr.	71.5M	6.000	7.782	1.000	24.2	53.4
146 Degr.	71.5M	6.000	7.782	1.000	24.2	53.4
147 Degr.	71.7M	6.000	7.782	1.000	24.2	53.5
148 Degr.	72.4M	6.000	7.782	1.000	24.3	53.7
149 Degr.	73.4M	6.000	7.782	1.000	24.5	53.9
150 Degr.	74.4M	6.000	7.782	1.000	24.6	54.2
151 Degr.	74.9M	6.000	7.782	1.000	24.7	54.3
152 Degr.	75.3M	6.000	7.782	1.000	24.8	54.4
153 Degr.	75.4M	6.000	7.782	1.000	24.8	54.4
154 Degr.	75.4M	6.000	7.782	1.000	24.8	54.4
155 Degr.	75.4M	6.000	7.782	1.000	24.8	54.4
156 Degr.	75.5M	6.000	7.782	1.000	24.8	54.4
157 Degr.	75.6M	6.000	7.782	1.000	24.8	54.5
158 Degr.	75.8M	6.000	7.782	1.000	24.9	54.5
159 Degr.	76.0M	6.000	7.782	1.000	24.9	54.6
160 Degr.	76.1M	6.000	7.782	1.000	24.9	54.6
161 Degr.	76.3M	6.000	7.782	1.000	24.9	54.6
162 Degr.	76.6M	6.000	7.782	1.000	25.0	54.7
163 Degr.	77.2M	6.000	7.782	1.000	25.1	54.9
164 Degr.	78.1M	6.000	7.782	1.000	25.2	55.1
165 Degr.	79.2M	6.000	7.782	1.000	25.4	55.3
166 Degr.	80.6M	6.000	7.782	1.000	25.6	55.7
167 Degr.	81.9M	6.000	7.782	1.000	25.8	55.9
168 Degr.	82.9M	6.000	7.782	1.000	25.9	56.2

Predicted Signal Contours:

43 18 21 - FIGURE 3

83 33 28 - TABULATION OF PROPOSED FRANKENMUTH, MI CONTOURS

ERP = 6 kW, 7.782 dBk FM - 2-6 Tables						
Radial	HAAT	kW	dBk	Field	60 dBu.5	48 dBu.1
169 Degr.	83.4M	6.000	7.782	1.000	26.0	56.3
170 Degr.	83.9M	6.000	7.782	1.000	26.0	56.4
171 Degr.	84.3M	6.000	7.782	1.000	26.1	56.5
172 Degr.	84.8M	6.000	7.782	1.000	26.2	56.6
173 Degr.	84.9M	6.000	7.782	1.000	26.2	56.6
174 Degr.	84.9M	6.000	7.782	1.000	26.2	56.6
175 Degr.	84.7M	6.000	7.782	1.000	26.2	56.6
176 Degr.	84.9M	6.000	7.782	1.000	26.2	56.6
177 Degr.	85.1M	6.000	7.782	1.000	26.2	56.6
178 Degr.	85.4M	6.000	7.782	1.000	26.3	56.7
179 Degr.	85.8M	6.000	7.782	1.000	26.3	56.8
180 Degr.	86.2M	6.000	7.782	1.000	26.4	56.9
181 Degr.	86.5M	6.000	7.782	1.000	26.4	56.9
182 Degr.	86.7M	6.000	7.782	1.000	26.4	57.0
183 Degr.	86.7M	6.000	7.782	1.000	26.4	57.0
184 Degr.	86.1M	6.000	7.782	1.000	26.4	56.9
185 Degr.	85.7M	6.000	7.782	1.000	26.3	56.8
186 Degr.	85.8M	6.000	7.782	1.000	26.3	56.8
187 Degr.	86.1M	6.000	7.782	1.000	26.4	56.9
188 Degr.	86.7M	6.000	7.782	1.000	26.4	57.0
189 Degr.	87.4M	6.000	7.782	1.000	26.5	57.1
190 Degr.	87.8M	6.000	7.782	1.000	26.6	57.2
191 Degr.	88.0M	6.000	7.782	1.000	26.6	57.3
192 Degr.	88.0M	6.000	7.782	1.000	26.6	57.3
193 Degr.	88.1M	6.000	7.782	1.000	26.6	57.3
194 Degr.	88.5M	6.000	7.782	1.000	26.7	57.4
195 Degr.	88.9M	6.000	7.782	1.000	26.8	57.4
196 Degr.	89.1M	6.000	7.782	1.000	26.8	57.5
197 Degr.	89.1M	6.000	7.782	1.000	26.8	57.5
198 Degr.	89.3M	6.000	7.782	1.000	26.8	57.5
199 Degr.	89.6M	6.000	7.782	1.000	26.9	57.6
200 Degr.	89.7M	6.000	7.782	1.000	26.9	57.6
201 Degr.	89.8M	6.000	7.782	1.000	26.9	57.6
202 Degr.	90.2M	6.000	7.782	1.000	26.9	57.7
203 Degr.	90.6M	6.000	7.782	1.000	27.0	57.8
204 Degr.	91.0M	6.000	7.782	1.000	27.1	57.9
205 Degr.	91.4M	6.000	7.782	1.000	27.1	58.0
206 Degr.	91.9M	6.000	7.782	1.000	27.2	58.1
207 Degr.	92.2M	6.000	7.782	1.000	27.2	58.1
208 Degr.	92.5M	6.000	7.782	1.000	27.3	58.2
209 Degr.	92.7M	6.000	7.782	1.000	27.3	58.2
210 Degr.	92.8M	6.000	7.782	1.000	27.3	58.2
211 Degr.	92.9M	6.000	7.782	1.000	27.3	58.3
212 Degr.	93.1M	6.000	7.782	1.000	27.4	58.3
213 Degr.	93.4M	6.000	7.782	1.000	27.4	58.4
214 Degr.	93.8M	6.000	7.782	1.000	27.5	58.4
215 Degr.	94.2M	6.000	7.782	1.000	27.5	58.5

Ave. HAAT= 78.2M, Ant. COR= 320.2M AMSL

Predicted Signal Contours:

42 10 15 - FIGURE 3
82 59 29 - TABULATION OF CKLW CONTOURS

ERP = 100 kW, 20 dBk		FM - 2-6 Tables				
Radial	HAAT	kW	dBk	Field	54 dBu.5	54 dBu.1
310 Degr.	307.2M	100.000	20.000	1.000	87.0	105.8
311 Degr.	307.2M	100.000	20.000	1.000	87.0	105.8
312 Degr.	307.2M	100.000	20.000	1.000	87.0	105.8
313 Degr.	307.1M	100.000	20.000	1.000	87.0	105.8
314 Degr.	307.0M	100.000	20.000	1.000	87.0	105.8
315 Degr.	307.0M	100.000	20.000	1.000	87.0	105.8
316 Degr.	307.0M	100.000	20.000	1.000	87.0	105.8
317 Degr.	307.0M	100.000	20.000	1.000	87.0	105.8
318 Degr.	306.9M	100.000	20.000	1.000	87.0	105.7
319 Degr.	306.7M	100.000	20.000	1.000	87.0	105.7
320 Degr.	306.5M	100.000	20.000	1.000	86.9	105.7
321 Degr.	306.3M	100.000	20.000	1.000	86.9	105.7
322 Degr.	306.1M	100.000	20.000	1.000	86.9	105.7
323 Degr.	305.8M	100.000	20.000	1.000	86.9	105.6
324 Degr.	305.6M	100.000	20.000	1.000	86.9	105.6
325 Degr.	305.4M	100.000	20.000	1.000	86.9	105.6
326 Degr.	305.3M	100.000	20.000	1.000	86.9	105.6
327 Degr.	305.0M	100.000	20.000	1.000	86.8	105.6
328 Degr.	304.4M	100.000	20.000	1.000	86.8	105.5
329 Degr.	303.5M	100.000	20.000	1.000	86.7	105.4
330 Degr.	302.5M	100.000	20.000	1.000	86.6	105.3
331 Degr.	301.7M	100.000	20.000	1.000	86.6	105.2
332 Degr.	301.2M	100.000	20.000	1.000	86.5	105.2
333 Degr.	300.9M	100.000	20.000	1.000	86.5	105.2
334 Degr.	300.6M	100.000	20.000	1.000	86.5	105.1
335 Degr.	300.3M	100.000	20.000	1.000	86.5	105.1
336 Degr.	300.2M	100.000	20.000	1.000	86.5	105.1
337 Degr.	300.0M	100.000	20.000	1.000	86.4	105.1
338 Degr.	299.8M	100.000	20.000	1.000	86.4	105.1
339 Degr.	299.7M	100.000	20.000	1.000	86.4	105.0
340 Degr.	299.7M	100.000	20.000	1.000	86.4	105.0
341 Degr.	299.7M	100.000	20.000	1.000	86.4	105.0
342 Degr.	299.7M	100.000	20.000	1.000	86.4	105.0
343 Degr.	299.8M	100.000	20.000	1.000	86.4	105.1
344 Degr.	299.8M	100.000	20.000	1.000	86.4	105.1
345 Degr.	299.8M	100.000	20.000	1.000	86.4	105.1
346 Degr.	299.8M	100.000	20.000	1.000	86.4	105.1
347 Degr.	299.6M	100.000	20.000	1.000	86.4	105.0
348 Degr.	299.1M	100.000	20.000	1.000	86.4	105.0
349 Degr.	298.4M	100.000	20.000	1.000	86.3	104.9
350 Degr.	297.9M	100.000	20.000	1.000	86.3	104.9
351 Degr.	297.4M	100.000	20.000	1.000	86.2	104.8
352 Degr.	296.8M	100.000	20.000	1.000	86.2	104.8
353 Degr.	296.3M	100.000	20.000	1.000	86.1	104.7
354 Degr.	295.7M	100.000	20.000	1.000	86.1	104.7
355 Degr.	295.0M	100.000	20.000	1.000	86.0	104.6
356 Degr.	294.1M	100.000	20.000	1.000	86.0	104.5
357 Degr.	292.6M	100.000	20.000	1.000	85.8	104.4
358 Degr.	291.2M	100.000	20.000	1.000	85.7	104.2
359 Degr.	289.7M	100.000	20.000	1.000	85.6	104.1
0 Degr.	288.7M	100.000	20.000	1.000	85.5	104.0
1 Degr.	290.0M	100.000	20.000	1.000	85.6	104.1
2 Degr.	291.3M	100.000	20.000	1.000	85.7	104.2
3 Degr.	292.6M	100.000	20.000	1.000	85.8	104.4
4 Degr.	293.6M	100.000	20.000	1.000	85.9	104.5
5 Degr.	294.2M	100.000	20.000	1.000	86.0	104.5
6 Degr.	294.7M	100.000	20.000	1.000	86.0	104.6
7 Degr.	295.0M	100.000	20.000	1.000	86.0	104.6
8 Degr.	295.3M	100.000	20.000	1.000	86.1	104.6
9 Degr.	295.5M	100.000	20.000	1.000	86.1	104.6
10 Degr.	295.6M	100.000	20.000	1.000	86.1	104.7

Ave. HAAT= 300.0M, Ant. COR= 482.4M AMSL

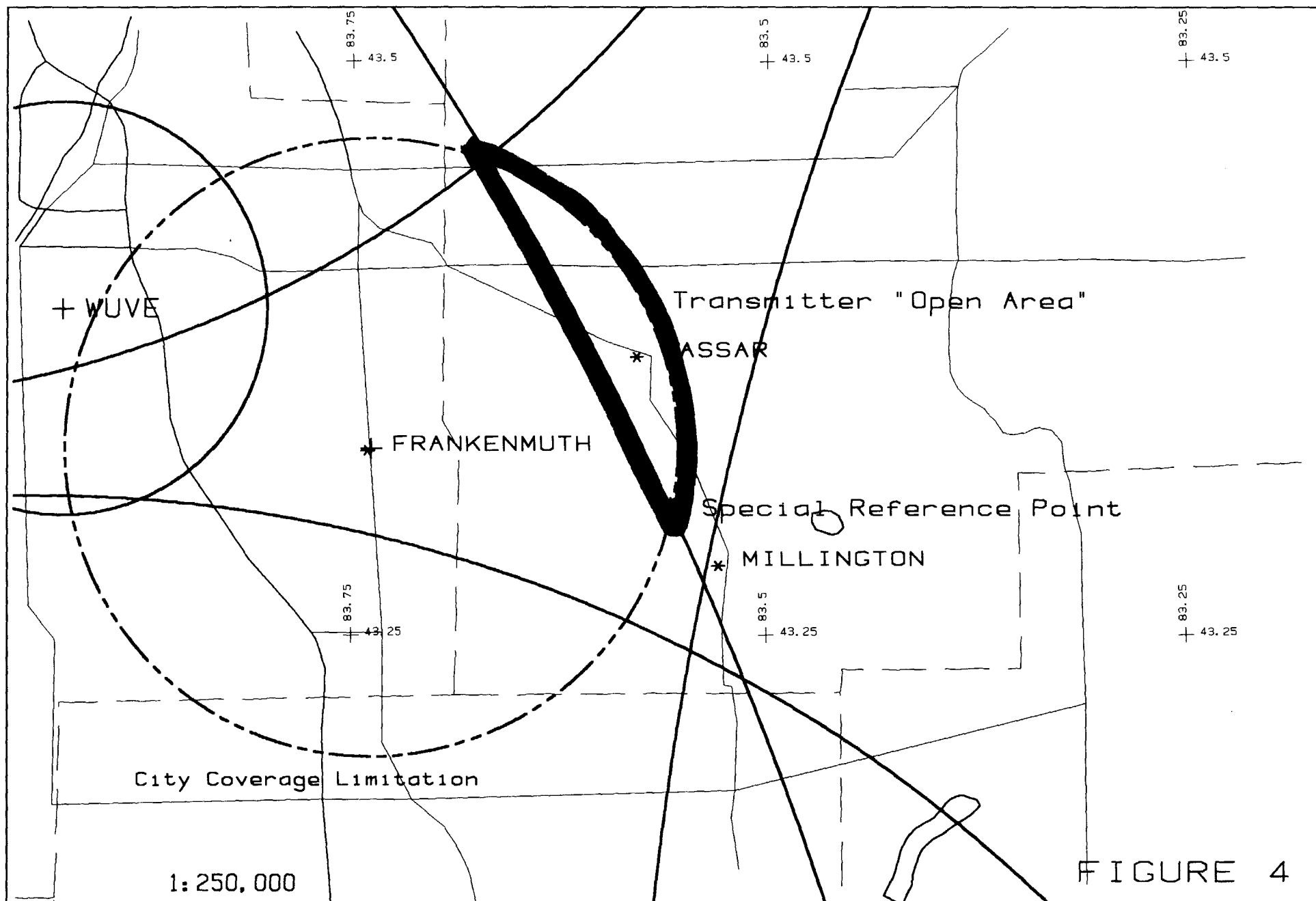
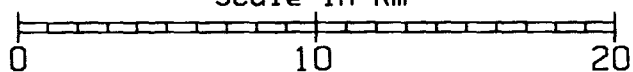


FIGURE 4

Scale in km



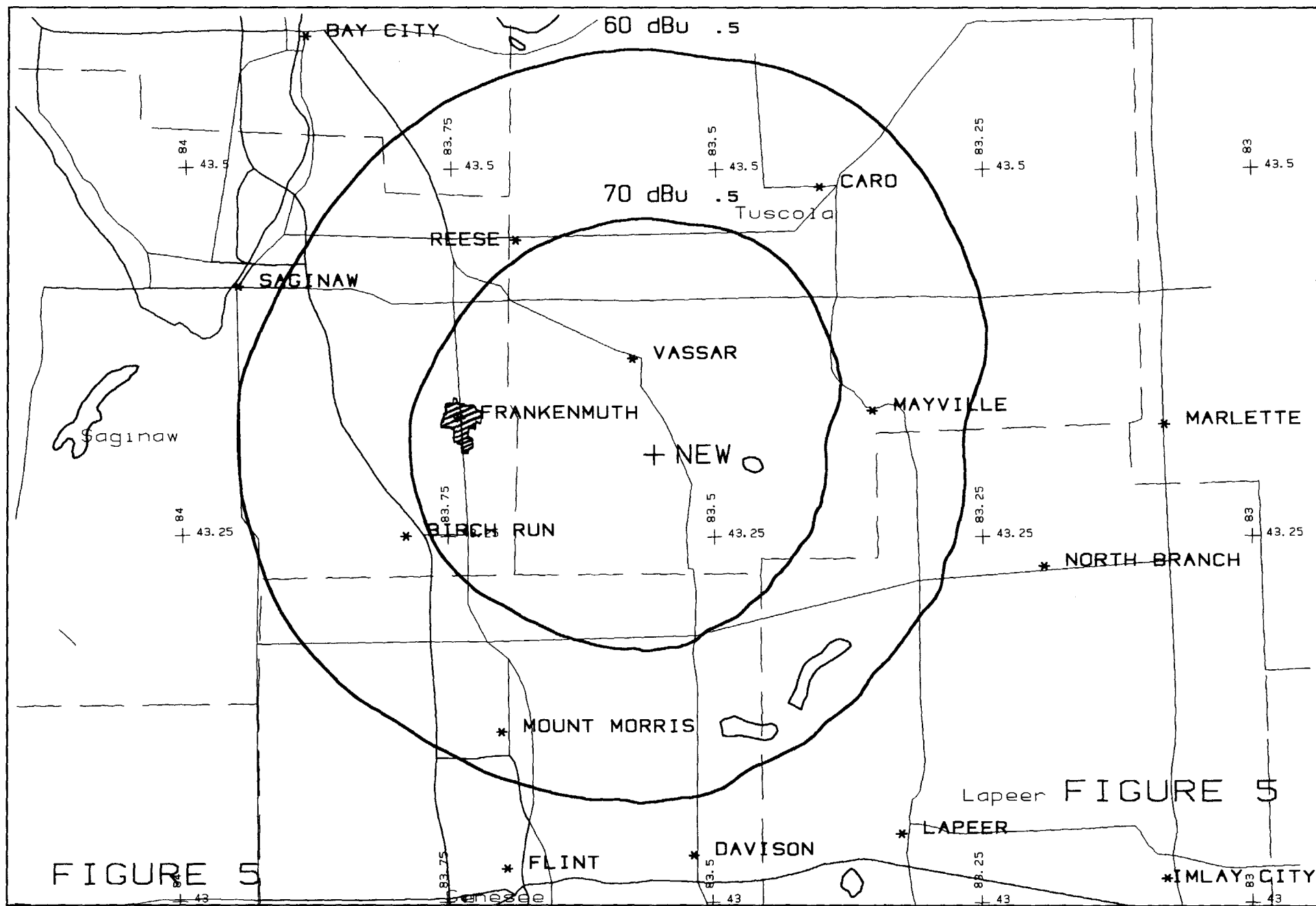
CHANNEL 229A TRANSMITTER OPEN AREA

N. Lat. 43 19 44

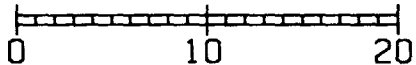
W. Lng. 83 34 06

FRANKENMUTH, MI

MUNN & ASSOC-03/95



Scale in km



NEW - FRANKENMUTH, MI 229A 6kW @ 100M
N. Lat. 43 18 21 W. Lng. 83 33 28

FRANKENMUTH COVERAGE MAP
MUNN & ASSOC. - 04/95

Predicted Signal Contours:

43 18 21 - FIGURE 6

83 33 28 - TABULATION OF PROPOSED SERVICE CONTOURS

ERP = 6 kW, 7.782 dBk FM - 2-6 Tables

Radial	HAAT	kW	dBk	Field	70 dBu.5	60 dBu.5
0 Degr.	119.1M	6.000	7.782	1.000	17.8	30.6
45 Degr.	108.1M	6.000	7.782	1.000	16.9	29.3
90 Degr.	67.0M	6.000	7.782	1.000	13.1	23.5
135 Degr.	67.5M	6.000	7.782	1.000	13.2	23.6
180 Degr.	86.2M	6.000	7.782	1.000	14.8	26.4
225 Degr.	100.1M	6.000	7.782	1.000	16.2	28.3
270 Degr.	128.7M	6.000	7.782	1.000	18.5	31.7
315 Degr.	123.0M	6.000	7.782	1.000	18.1	31.0

Ave. HAAT= 100.0M, Ant. COR= 320.2M AMSL

CERTIFICATE OF SERVICE

I, Andrew S. Kersting, hereby certify that on this 12th day of April, 1995, a copy of the foregoing **PETITION FOR RULEMAKING** was hand delivered to the following:

Mr. Roy J. Stewart
Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W., Room 314
Washington, D.C. 20554


Andrew S. Kersting